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VIA FEDEX 8614 4577 3288

August 15, 2007

The Honorable George B. Daniels
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: Wood on behalf of the USA v. Applied Research Assoc., Inc.,
et al
07 CIV 3314 (GBD)
Filed under seal

Dear Judge Daniels:

Pursuant to Fed.R.Civ.P. 42(a), plaintiff/relator in the above matter requests that this case be consolidated with the case entitled Dr. Morgan Reynolds on behalf of the USA v. Science Applications International Corporation, et al, Case No. 07 CIV 4612 (GEL).

Each of these complaints contain similar allegations against common defendants and were filed within 6 weeks of each other. The plaintiffs/relators are represented by the same law firm and the cases were prepared and filed by the same attorney.

Accordingly, given the closely related nature of the factual and legal claims presented against common defendants, the cases should now be consolidated for the purposes of (1) discovery up to the stage of resolving dispositive motions; and (2) for subsequent trial, if necessary. Rule 42(a) authorizes a trial judge, in cases presenting common questions of law and fact, to consolidate cases in order to avoid unnecessary costs or delay.

Dr. Judy Wood on behalf of the USA v. Applied Research Assoc., Inc., et al, remains filed under seal and service of the



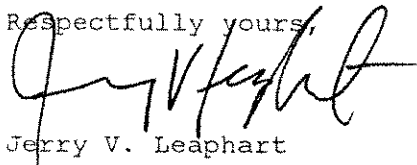
defendants has yet to be ordered. We request that this file be unsealed in accordance with the Government's Notice of Election to Decline Intervention dated June 22, 2007 and the Government's proposed order, copies of which are attached.

Dr. Morgan Reynolds on behalf of the USA v. Science Applications International Corporation, et al, Case No. 07 CIV 4612 (GEL) case has been unsealed by order of the Honorable Gerald E. Lynch, order dated July 6, 2007 and service by waiver has been effectuated. Most of the defendants have until September 3, 2007 to complete and return the waiver. Seven of the defendants have until September 14, 2007 to do so.

We enclose a copy of a letter from Attorney Benjamin H. Torrance, Assistant U.S. Attorney addressed to The Honorable Victor Marrero and dated August 8, 2007. In that letter Attorney Torrance suggests that three cases, Dr. Judy Wood v. Applied Research Assoc., Inc., Case No. 07 CIV 3314 (GBD), Dr. Morgan Reynolds v. Science Applications International Corporation, et al, Case No. 07 CIV 4612 (GEL) and Edward J. Haas v. Carlos M. Gutierrez, et al, Case No. 07 CIV 3623 (VM) may be considered related under Local Rule for the Division of Business 15. The Wood and Reynolds cases are similar enough for consolidation, but the Haas case is a different type of claim.

In the interest of judicial economy, we believe that the two cases, Wood and Reynolds should be consolidated and enclose a proposed order to effectuate said request.

Respectfully yours,



Jerry V. Leaphart

Enclosure

CC: The Honorable Gerald E. Lynch
Benjamin H. Torrance, Esq.
Adam S. Ennis, Esq.